

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

**KARYN KATHLEEN DE LONG**  
**8701 Young Lane**  
**Austin, TX 78737**

**Registered Nurse License No. 190831**

Respondent

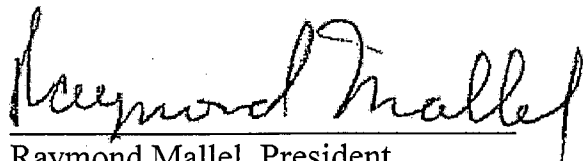
Case No. 2012-627

**DECISION AND ORDER**

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **April 29, 2013.**

IT IS SO ORDERED **April 29, 2013.**



Raymond Mallel, President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 GEOFFREY WARD  
Deputy Attorney General  
4 State Bar No. 246437  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2660  
6 Facsimile: (213) 897-2804  
E-mail: Geoffrey.Ward@doj.ca.gov  
7 Attorneys for Complainant

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2012-627

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13 **8701 Young Lane**  
**Austin, TX 78737**  
14 **Registered Nurse License No. 190831**

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

15 Respondent.

16 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
17 proceeding that the following matters are true:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., R.N. (Complainant) is the Interim Executive Officer of the  
20 Board of Registered Nursing. She brought this action solely in her official capacity and is  
21 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by  
22 Geoffrey Ward, Deputy Attorney General.

23 2. Karyn Kathleen De Long (Respondent) is representing herself in this proceeding and  
24 has chosen not to exercise her right to be represented by counsel.

25 3. On or about July 31, 1968, the Board of Registered Nursing issued Registered Nurse  
26 License No. 190831 to Karyn Kathleen De Long (Respondent). The Registered Nurse License  
27 expired on June 30, 2006, and has not been renewed.  
28



1 Registered Nursing may communicate directly with the Board regarding this stipulation and  
2 surrender, without notice to or participation by Respondent. By signing the stipulation,  
3 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind  
4 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt  
5 this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be  
6 of no force or effect, except for this paragraph, it shall be inadmissible in any legal action  
7 between the parties, and the Board shall not be disqualified from further action by having  
8 considered this matter.

9 11. The parties understand and agree that facsimile copies of this Stipulated Surrender of  
10 License and Order, including facsimile signatures thereto, shall have the same force and effect as  
11 the originals.

12 12. This Stipulated Surrender of License and Order is intended by the parties to be an  
13 integrated writing representing the complete, final, and exclusive embodiment of their agreement.  
14 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,  
15 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order  
16 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing  
17 executed by an authorized representative of each of the parties.

18 13. In consideration of the foregoing admissions and stipulations, the parties agree that  
19 the Board may, without further notice or formal proceeding, issue and enter the following Order:

20 **ORDER**

21 IT IS HEREBY ORDERED that Registered Nurse License No. 190831, issued to  
22 Respondent Karyn Kathleen De Long, is surrendered and accepted by the Board of Registered  
23 Nursing.

24 1. The surrender of Respondent's Registered Nurse License and the acceptance of the  
25 surrendered license by the Board shall constitute the imposition of discipline against Respondent.  
26 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
27 license history with the Board of Registered Nursing.  
28

2. Respondent shall lose all rights and privileges as a registered nurse in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board her pocket license and, if one was issued, her wall certificate on or before the effective date of the Decision and Order.

4. If she ever applies for licensure or petitions for reinstatement in the State of California, the Board shall treat it as a new application for licensure. Respondent must comply with all the laws, regulations and procedures for licensure in effect at the time the application or petition is filed, and all of the charges and allegations contained in Accusation No. 2012-627 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the application or petition.

5. If and when Respondent's license is reinstated, she shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the amount of \$485.00. Respondent shall be permitted to pay these costs in a payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the Board from reducing the amount of cost recovery upon reinstatement of the license.

6. Respondent shall not apply for licensure or petition for reinstatement for two (2) years from the effective date of the Board of Registered Nursing's Decision and Order.

#### ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 5/24/12

Karyn Kathleen De Long  
KARYN KATHLEEN DE LONG

Respondent

I no longer have a printed license in my possession. I retired in 2006 & then shredded all my licenses in 2008 to take care of my grandfather for time. *[Signature]*

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated:

6/18/2012

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
KAREN B. CHAPPELLE  
Supervising Deputy Attorney General



GEOFFREY WARD  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 2012-627**

1 KAMALA D. HARRIS  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 GEOFFREY WARD  
Deputy Attorney General  
4 State Bar No. 246437  
300 So. Spring Street, Suite 1702  
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8 **BEFORE THE**  
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**DEPARTMENT OF CONSUMER AFFAIRS**  
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. **2012-627**

11 **Karyn Kathleen De Long**

12 **8701 Young Lane**  
13 **Austin, TX 78737**

**ACCUSATION**

14 **Registered Nurse License No. 190831**  
15 **Nurse Practitioner Certificate No. 1290**  
**Public Health Nurse Certificate No. 13560**

16 Respondent.

17  
18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., R.N. ("Complainant") brings this Accusation solely in her  
21 official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department  
22 of Consumer Affairs.

23 2. On or about July 31, 1968, the Board of Registered Nursing issued Registered Nurse  
24 License Number 190831 to Karyn Kathleen De Long ("Respondent"). The Registered Nurse  
25 license expired on June 30, 2006 and has not been renewed.

26 3. On or about June 4, 1985, the Board of Registered Nursing issued Nurse Practitioner  
27 Certificate No. 1290 to Respondent. It expired on June 30, 2006 and has not been renewed.  
28



1       4.    On or about March 18, 1969, the Board of Registered Nursing issued Public Health  
2 Nurse Certificate No. 13560 to Respondent. It expired on June 30, 2006 and has not been  
3 renewed.

4                                   **JURISDICTION AND STATUTORY PROVISIONS**

5       5.    This Accusation is brought before the Board of Registered Nursing ("Board"),  
6 Department of Consumer Affairs, under the authority of the following laws:

7       6.    Section 2750 of the Business and Professions Code (all section references are to the  
8 Business and Professions Code unless otherwise noted) provides, in pertinent part, that the Board  
9 may discipline any licensee, including a licensee holding a temporary or inactive license, for any  
10 reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

11       7.    Section 2764 provides, in pertinent part, that the expiration of a license or  
12 certification shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding  
13 against the licensee or to render a decision imposing discipline on the license. Under Section  
14 2811 subdivision (b) the Board may renew an expired license at any time within eight years after  
15 the expiration.

16       8.    Section 118 subdivision (b) also grants the Board jurisdiction over suspended,  
17 expired, forfeited, cancelled, or surrendered licenses:

18       "The suspension, expiration, or forfeiture by operation of law of a license issued by a  
19 board in the department, or its suspension, forfeiture, or cancellation by order of the  
20 board or by order of a court of law, or its surrender without the written consent of the  
21 board, shall not, during any period in which it may be renewed, restored, reissued, or  
reinstated, deprive the board of its authority to institute or continue a disciplinary  
proceeding against the licensee upon any ground provided by law or to enter an order  
suspending or revoking the license or otherwise taking disciplinary action against the  
licensee on any such ground."

22       9.    Section 2761, which is part of Article 3 of the Nursing Practice Act, provides, in  
23 pertinent part:

24               "The board may take disciplinary action against a certified or licensed  
25 nurse or deny an application for a certificate or license for any of the following:

26               "(a) Unprofessional conduct, which includes, but is not limited to, the  
27 following:  
28               ...

1                   "(4) Denial of licensure, revocation, suspension, restriction, or any other  
2 disciplinary action against a health care professional license or certificate by another  
3 state or territory of the United States, by any other government agency, or by another  
4 California health care professional licensing board. A certified copy of the decision  
5 or judgment shall be conclusive evidence of that action...."

6                   **COST RECOVERY**

7           10. Section 125.3 provides, in pertinent part, that the Board, Registrar, or Director may  
8 request the administrative law judge to direct a licentiate found to have committed a violation or  
9 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
10 and enforcement of the case.

11                   **CAUSE FOR DISCIPLINE**

12                   **(Disciplinary Action by the Texas Board of Nursing)**

13           11. Respondent is subject to disciplinary action under Section 2761 subdivision (a)(4)  
14 because in November 2009 the Texas Board of Nursing ("Texas Board") accepted the voluntary  
15 surrender of her license to practice nursing in Texas. The circumstances of the Texas Board's  
16 disciplinary action are as follows:

17           12. On or about November 2009, Respondent agreed to voluntarily surrender her nursing  
18 license following a series of medication prescription errors. In a settlement agreement entitled,  
19 "Agreed Order", *In the Matter of Registered Nurse License Number 435299 issued to Karyn K.M.*  
20 *De Long*, the Texas Board made findings of fact and conclusions of law about Respondent's  
21 conduct. It found that while acting as a Family Nurse Practitioner at Texas University Health  
22 Center in San Marcos, Texas from November 2006 to June 2007 Respondent prescribed penicillin  
23 to four different patients each of whom had penicillin allergies. Each patient had these allergies  
24 clearly noted on their medical records. Two of them were actually given penicillin and  
25 experienced dangerous allergic reactions. But all four could have suffered serious health  
26 consequences from Respondent's behavior. Respondent attributed her medication errors to  
27 personal problems and attention deficit disorder. The Texas Board concluded this conduct  
28 constituted unprofessional conduct and ordered her license surrendered.

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13. Under Section 2761 subdivision (a)(4) the Texas Board's disciplinary action accepting Respondent's voluntary surrender of her Texas nursing license is grounds for the California Board to take its own disciplinary action.

## PRA YER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 190831 issued to Karyn Kathleen De Long;

2. Revoking or suspending Public Health Nurse Certificate No. 13560 issued to Karyn Kathleen De Long;

3. Revoking or suspending Nurse Practitioner Certificate No. 1290 issued to Karyn Kathleen De Long;

4      Ordering Karyn Kathleen De Long to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code Section 125.3;

5 Taking such other and further action as deemed necessary and proper.

DATED:

April 16, 2012

for LOUISE R. BAILEY, M.  
Interim Executive Office

LOUISE R. BAILEY, M.Ed., R.N.  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

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